

**FILED**  
1/24/2024  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Ian MacLeod,

*Plaintiff,*

v.

MidAmerican Energy Services, LLC,

*Defendant.*

No. 19 CV 683

Judge Lindsay C. Jenkins

**JOINT STIPULATIONS**

Plaintiff Ian MacLeod and Defendant MidAmerican Energy Services, LLC  
(collectively, the “Parties”) have conferred and hereby stipulate to the following  
facts:

1. Plaintiff Ian MacLeod is a resident of the State of Illinois.
2. Plaintiff was employed at MidAmerican from September 13, 2017 through October 23, 2017.
3. David White was Plaintiff’s direct supervisor.
4. On October 23, 2017, Plaintiff was provided a termination letter.
5. Plaintiff was not guaranteed commissions after his first 12 months.
6. Plaintiff was not guaranteed an annual raise.
7. Roger Berg was over 40 years old during the relevant period of time.
8. Kevin Fukumoto’s date of birth is 12/28/1961.
9. Greg Gault’s date of birth is 6/8/1993.
10. Rochelle Gobetz’s date of birth is 6/11/1965.
11. Ann Harris’s date of birth is 5/8/1978.

12. Steve Kim's date of birth is 7/25/1970.

13. Adam Lang's date of birth is 5/17/1989.

14. Ian MacLeod's date of birth is 9/21/1960.

15. Bob Reeter was over 40 years during the relevant period of time.

16. Andrew Spencer's date of birth is 9/17/1986.

17. Grant Suttie's date of birth was 8/23/1994.

You must treat these facts as having been proved for the purpose of this case.

Dated: January 24, 2024

LANGONE LAW LLC

By: /s/ 

Christopher Langone #6211105  
Langone Law  
205 North Michigan Ave., Ste. 810  
Chicago, IL 60601  
(312) 720-9191

**ATTORNEY FOR PLAINTIFF  
IAN MACLEOD**

SEGAL McCAMBRIDGE SINGER &  
MAHONEY, LTD

By: /s/ 

Joseph Kish # 6197916  
Benjamin J. Nellans #6321205  
Segal McCambridge Singer & Mahoney  
233 South Wacker Drive, Suite 5500  
Chicago, Illinois 60606  
(312) 645-7800

**ATTORNEYS FOR DEFENDANT  
MIDAMERICAN ENERGY  
SERVICES, LLC**